

## **REMARKS**

Claims 1-39 remain pending. In the present Office Action, claims 1-39 were rejected under 35 U.S.C. § 102(e) as being anticipated by Duda et al., U.S. Patent No. 6,628,287 ("Duda"). Applicants respectfully traverse this rejection and request reconsideration.

Applicants respectfully submit that claims 1-39 recite combinations of features not taught or suggested in the cited art. For example, claim 1 recites a combination of features including: "a first node configured to participate in a simulation of a system under test, wherein the first node is configured to simulate a first component of the system under test...wherein, responsive to the hot pull command, the first node ceases participation in the simulation to simulate a removal of the first component from the system under test." The Office Action asserts that the above highlighted features are anticipated by Duda at col. 4, lines 34-55; col. 6, lines 7-12; and col. 9, line 19 to col. 10, line 24. Applicants respectfully disagree.

Duda teaches a distributed simulation system for simulating real world objects, some of which can be controlled by a user (Duda, col. 4, lines 56-58). The objects can be divided into categories: "1) objects that are influenced by user commands, which are called 'actors', and 2) objects that are not influenced by commands, which are called 'obstacles'. An actor may be, for example, an avatar. Actors are further categorized as either: 1) 'pilot actors', which are actors that are influenced by local user commands, or 2) 'shadow actors', which are actors that are influenced by user commands from a remote client." (Duda, col. 5, lines 59-66). Clients may calculate pilot actor's state ahead of the global time and may receive state regarding shadow actors behind global time. Various mechanisms for correcting errors introduced by these time shifts, network errors that result in lost packets, etc. are described. However, nothing in Duda has anything to do with a hot pull command, nor is there any teaching of ceasing participation in the simulation to simulate a removal of a component from the system. For example, there is no teaching or suggestion of receiving a hot pull command to remove an actor or obstacle

from a simulation, nor of ceasing participation in the simulation to simulate a removal of a component from the system under test.

At col. 4, lines 34-55, Duda teaches the network environment on which the simulation is executed. However, there is no teaching or suggestion of a hot pull command or responding to a hot pull command. At col. 6, lines 7-12, Duda teaches: "Global virtual time advances in synchronization with wall-clock time, and is the same at any given instant on all machines. Global virtual time is authoritatively maintained by a server, as described below, and may be propagated to all clients participating in the simulation using any conventional clock synchronization protocol, such as Network Time Protocol (NTP)." These teachings describe how time is maintained in Duda's simulation system, which again has nothing to do with a hot pull command or simulating the removal of a component from the system under test. Finally, col. 9, line 19 to col. 10, line 24 of Duda describes how obstacles are handled, how actors interact with obstacles, etc. Generally, the obstacles are characterized by a state function and the state of the obstacle is calculate locally at each client in a fashion similar to actors (Duda, col. 9, lines 19-23). Duda also describes how objects that may be influenced by multiple actors at the same time is handled (e.g. two actors interacting with a soccer ball). However, there is no teaching or suggestion of a hot pull command, nor of ceasing participation in the simulation.

Applicants can find no teaching or suggestion anywhere in Duda for the above highlighted features of claim 1. For at least all of the above stated reasons, Applicants respectfully submit that Duda does not anticipate claim 1. Claims 2-10, dependent from claim 1, are similarly not anticipated by Duda for at least the above stated reasons. Each of claims 2-10 recites additional combinations of features not anticipated by Duda.

Claim 11 recites a combination of features including: "the first node configured to participate in a simulation and to simulate a first component of a system under test in the simulation; and ceasing participation of the first node in the simulation responsive to the hot pull command to simulate a removal of the first component from the system under

test". The same teachings of Duda highlighted above with regard claim 1 are alleged to anticipate claim 11. Applicants respectfully submit that Duda does not anticipate the features of claim 11, either. Each of claims 12-19, dependent from claim 11, recites additional combinations of features not anticipated by Duda.

Claim 20 recites a combination of features including: "first instructions which, when executed, cease participation in a simulation by a first node in a distributed simulation system responsive to receiving a hot pull command, the first node simulating a first component of a system under test, and the first node ceasing participation in the simulation simulates removal of the first component from the system under test". The same teachings of Duda highlighted above with regard claim 1 are alleged to anticipate claim 20. Applicants respectfully submit that Duda does not anticipate the features of claim 20, either. Each of claims 21-26, dependent from claim 20, recites additional combinations of features not anticipated by Duda.

Claim 27 recites a combination of features including: "a first node configured to participate in a simulation of a system under test, the first node configured to simulate a first component of the system under test ...wherein the first node does not participate in the simulation prior to the hot plug command, and wherein the first node begins participation in the simulation responsive to the hot plug command to simulate insertion of the first component in the system under test". The same teachings of Duda highlighted above with regard claim 1 are alleged to anticipate claim 27. Applicants respectfully submit that Duda does not anticipate the features of claim 27, either. Each of claims 28-33, dependent from claim 27, recites additional combinations of features not anticipated by Duda.

Claim 34 recites a combination of features including: "the first node configured to participate in a simulation and to simulate a first component of a system under test in the simulation...the first node beginning participation in the simulation responsive to the hot plug command to simulate insertion of the first component into the system under test wherein the first node does not participate in the simulation prior to the hot plug

command." The same teachings of Duda highlighted above with regard claim 1 are alleged to anticipate claim 34. Applicants respectfully submit that Duda does not anticipate the features of claim 34, either. Each of claims 35-39, dependent from claim 34, recites additional combinations of features not anticipated by Duda.

Additionally, the Office Action asserts that claims 21-39 are directed to the computer program product and system for executing the computer program product for performing the steps in claims 1-20. Applicants respectfully traverse, at least with respect to some of the claims. Applicants respectfully submit that each claim should be examined based on the features recited in that claim.

## **CONCLUSION**

Applicants submit the application is in condition for allowance, and an early notice to that effect is requested.

If any extensions of time (under 37 C.F.R. § 1.136) are necessary to prevent the above referenced application(s) from becoming abandoned, Applicant(s) hereby petition for such extensions. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-96500/LJM.

Respectfully submitted,

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